

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

[1] JOSE DANIEL LE HARDY-FIGUEROA,
(Counts 1-35),
[2] [REDACTED],
(Counts 28, 30-35),
[3] DAVID PEÑA-CALO,
(Count 29),
[4] CARLOS J. CALO-RIVERA,
(Count 26),
[5] MARIA PULIDO-TORRES,
(Count 25),
[6] JONATHAN OCASIO-JAIME,
(Count 27),
Defendants.

INDICTMENT

CRIMINAL NO. 21-292 (*RAM*)

VIOLATIONS:

Counts 1-24: 18 U.S.C. §1709(a)
Counts 25-35: 18 U.S.C. §641

(35 COUNTS AND
FORFEITURE ALLEGATION)

THE GRAND JURY CHARGES:

Counts 1-24

**Theft of mail matter by officer or employee
18 U.S.C. § 1709(a)**

From on or about April 24, 2020 through on or about August 27, 2020, in the District of Puerto Rico, and within the jurisdiction of this Court,

[1] JOSE DANIEL LE HARDY-FIGUEROA,

the defendant herein, being an employee of the United States Postal Service, did embezzle a letter, package, mail, and article and thing contained therein, entrusted to him and which came into his possession intended to be conveyed by mail, and carried and delivered by any carrier, messenger, agent, and other person employed in any department of the Postal Service,

and forwarded through and delivered from any post office and station thereof established by authority of the Postmaster General and of the Postal Service, as described as below:

COUNT	MAILED FROM	MAILED TO	MAIL CONTENT	TOTAL AMOUNT
1	C.V., FL 34604	A.V.F., Sabana Seca, P.R. 00952	6 Postal Money Orders	\$5,000.00
2	C.A., Barceloneta, P.R. 00617	F.A., Woodhaven, N.Y. 11421	1 Postal Money Order	\$60.00
3	G.C.R., Caguas, 00725	Ash, Great Neck, N.Y., 11021	5 Postal Money Orders	\$4,290.00
4	E.E., Adjuntas, P.R. 00601	B.E., Fort Lauderdale, FL 33351	1 Postal Money Order	\$500.00
5	N.A.F., San Juan, P.R. 00907	N.A.F., Orlando, FL 32822	2 Postal Money Orders	\$2,000.00
6	A.I., Guayanilla, P.R. 00656	S.I., Longwood, FL 32750	2 Check #228317851 #228317915	\$66,639.11
7	L.N., Aguada, P.R. 00602	W.M., Kissimmee, FL 34758	12 Postal Money Orders	\$10,575.00
8	R.P., San Juan, P.R. 00926	M.S., Baltimore, MD 21231	3 Postal Money Orders	\$3,000.00
9	J.S.G., Cataño, P.R. 00962	AII Buyer, Palmetto, FL 34221	Check #10313180003532	\$10,308.25
10	DTRH, San Juan, P.R. 00919	J.V.O., Luquillo, P.R. 00773	Check #03759878	\$11,388.00
11	DTRH, San Juan, P.R. 00919	W.R.G., Luquillo, P.R. 00773	Check #0383534	\$480.00
12	DTRH, San Juan, P.R. 00919	G.S.C., Luquillo, P.R. 00773	Check #03838671	\$430.00
13	DTRH, San Juan, P.R. 00919	J.R.V., Guayama, P.R. 00784	Check #03892580	\$9,390.00
14	DTRH, San Juan, P.R. 00919	A.R.B., Sabana Grande, P.R. 00637	Check #03898928	\$11,586.00

COUNT	MAILED FROM	MAILED TO	MAIL CONTENT	TOTAL AMOUNT
15	DTRH, San Juan, P.R. 00919	W.C.M., Aguadilla, P.R. 00603	Check #03919389	\$11,586.00
16	DTRH, San Juan, P.R. 00919	A.R., Ponce, P.R. 00733	Check #03923708	\$11,454.00
17	DTRH, San Juan, P.R. 00919	A.P., Ponce, P.R. 00732	Check #03923702	\$11,520.00
18	U.S. Treasury, Kansas City, MO	M.R., Lunenburg, MA 01462	Check #044961118	\$1,200.00
19	E.X.O., Humacao, P.R. 00791	A.O., Saint Cloud, FL 34772	6 Postal Money Orders	\$6,000.00
20	M.O.R., Aibonito, P.R. 00705	D.S., Quebradilla, P.R. 00678	Check #000866	\$3,000.00
21	D.N.R, Atlanta, GA 30350	Y.D., San Juan, P.R. 00915	1 Postal Money Order	\$1,000.00
22	J.C.R., Camuy, P.R. 00627	C.C., Opa Locka, FL 33055	2 Postal Money Orders	\$2,000.00
23	A.R.C. Maricao, P.R. 00606	M.C., Orlando, FL 32862	Check #103117400002304	\$5,000.00
24	K.O.H., Moca, P.R. 00676	W.V.M., Kissimmee, FL 34742	Check #995526	\$5,150.00

Each Count a separate and distinct violation of 18 U.S.C. § 1709(a).

Counts 25-35
Theft of Government Property
18 U.S.C. § 641

On or about each set of dates set forth below, in the District of Puerto Rico, and within the jurisdiction of this Court, the defendants mentioned below, aiding and abetting each other, did knowingly and willfully steal, purloin or convert to their own use or use of another, money in an amount exceeding \$1,000, goods and property of the United States Postal Service (USPS), a department or agency of the United States, as described below:

COUNT	DATE	DEFENDANTS	TOTAL AMOUNT
25	April 29, 2020	[1] José Daniel Le Hardy-Figueroa, [5] María Pulido-Torres	\$5,000.00
26	July 2, 2020	[1] José Daniel Le Hardy-Figueroa, [4] Carlos J. Calo-Rivera	\$4,290.00
27	July 10, 2020	[1] José Daniel Le Hardy-Figueroa, [6] Jonathan Ocasio-Jaime	\$2,000.00
28	July 18, 2020	[1] José Daniel Le Hardy-Figueroa, [REDACTED]	\$2,375.00
29	July 20, 2020	[1] José Daniel Le Hardy-Figueroa, [3] David Peña-Calo	\$3,600.00
30	July 20, 2020	[1] José Daniel Le Hardy-Figueroa, [REDACTED]	\$2,700.00
31	August 21, 2020	[1] José Daniel Le Hardy-Figueroa, [REDACTED]	\$2,000.00
32	August 22, 2020	[1] José Daniel Le Hardy-Figueroa, [2] [REDACTED]	\$1,000.00
33	August 24, 2020	[1] José Daniel Le Hardy-Figueroa, [2] [REDACTED]	\$1,000.00
34	August 25, 2020	[1] José Daniel Le Hardy-Figueroa, [2] [REDACTED]	\$1,000.00
35	August 26, 2020	[1] José Daniel Le Hardy-Figueroa, [2] [REDACTED]	\$3,000.00

Each Count a separate and distinct violation of 18 U.S.C. §§ 641 and 2.

FORFEITURE ALLEGATIONS

The allegations contained in Counts Twenty-Five through Thirty-Five of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c). Upon conviction of any offense in violation of 18 U.S.C. § 641 as set forth in Counts Twenty-Five through Thirty-Five of this Indictment, the defendants, [1] **José Daniel Le Hardy-Figueroa**, [2] [REDACTED], [3] **David Peña-Calo**, [4] **Carlos J. Calo-Rivera**, [5] **María Pulido-Torres**, and [6] **Jonathan Ocasio-Jaime** shall forfeit to the United States of America, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses, including but not limited to a money judgment in the amount of \$27,965.

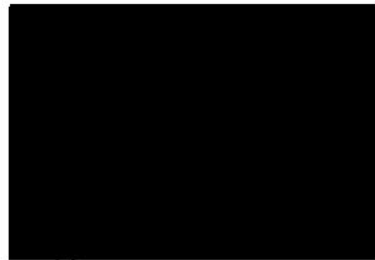
If any of the property described above, as a result of any act or omission of the defendants (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the court; (d) has been substantially diminished in value; or (e) has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

All pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

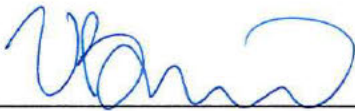
W. Stephen Muldrow
United States Attorney




Max Pérez-Bouret
Assistant United States Attorney, Chief
Transnational Organized Crime Section



Date: 8/19/21



Vanessa E. Bonhomme
Assistant United States Attorney, Deputy Chief
Transnational Organized Crime Section



Camille García-Jiménez
Assistant United States Attorney

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